

POMERANTZ LLP

600 Third Avenue
New York, NY 10016

WOLF POPPER LLP

845 Third Avenue
New York, NY 10022

January 26, 2023

Via ECF

Hon. Andrew M. Edison
United States Magistrate Judge
United States District Court
Southern District of Texas
601 Rosenberg, Seventh Floor
Galveston, TX 77550

Re: Edwards v. McDermott Int'l, et al., No. 4:18-cv-4330;
Kingstown v. Dickson, et al., No. 4:20-cv-02880

Dear Judge Edison,

In accordance with this Court's December 23, 2022 Orders, and after conferring in good faith, the parties in the above-captioned actions respectfully submit herewith their proposals regarding an order to achieve case coordination and establish a deposition protocol.

- Exhibit A is the joint proposal of the §10(b) Lead Plaintiff, the §14(a) Lead Plaintiff, and the *Kingstown* plaintiffs;
- Exhibit B is the Defendants' proposal.

If the Court wishes to have a hearing, the parties respectfully request the opportunity to propose mutually workable dates for the Court's consideration. The parties otherwise will continue to confer.

Respectfully submitted,

/s/ Matthew Tuccillo
Lead Counsel for the § 10(b) Lead Plaintiff

/s/ Matthew Insley-Pruitt
Lead Counsel for the §14(a) Lead Plaintiff

Cc: Defense counsel
Kingstown plaintiffs' counsel